

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

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| DATATREASURY CORP., | § | |
| <i>Plaintiff</i> | § | CIVIL ACTION NO. |
| | § | 2:04-CV-85 |
| vs. | § | Hon. David J. Folsom |
| | § | |
| SMALL VALUE PAYMENTS | § | |
| COMPANY | § | |
| <i>Defendant</i> | § | |

PLAINTIFF'S PRELIMINARY CLAIM CONSTRUCTION AND EXTRINSIC EVIDENCE

Plaintiff DataTreasury Corp. ("DataTreasury") submits the following terms and claims construction and contends that those claims previously construed by the Court should be construed in the same manner. The additional term "Image" is included for construction with the proposed construction.

Further extrinsic evidence may be provided by Professor John Hiles of the United States Post Naval Graduate School.

COURT'S CLAIM CONSTRUCTION CHART
U.S. PATENT NOS. 5,910,988 AND 6,032,137

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| Remote | "at a physical separate locations; not near or immediate; distant." | As construed by the Court in its Markman Order |
| Subsystem | "an organization of computer components that comprises a functional unit that is part of a larger system." | As construed by the Court in its Markman Order |
| Data access subsystems | "a subsystem that provides for the input of transaction data into the overall system and provides that data to other parts of the overall system." | As construed by the Court in its Markman Order |
| Data collecting subsystem | "a subsystem that receives data from remote data access subsystems and transmits that data to a central data processing subsystem." | As construed by the Court in its Markman Order |
| Subsystem identification information | "the information that identifies the remote data subsystem or a subsystem that is a part of the remote data access subsystem." | As construed by the Court in its Markman Order |
| Data access controller | "a computer chip, circuit board, or a computer that interfaces between the imaging subsystem and the remainder of the overall claimed system, and controls the operation of the imaging subsystem." | As construed by the Court in its Markman Order |

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| <p>Paper transaction data, transaction data, data</p> | <p>“information concerning a transaction reflected on a paper document, where the ‘paper transaction data’ includes and image of the paper document when it is transmitted from the remote data access subsystem..”</p> <p>“When the term ”transaction data” is used in the claims without an accompanying definite article (e.g., “the” or “said”), it should be understood to encompass any type of transaction data and not be limited to “paper transaction data.” “When the term is used with a definite article (e.g., “the” or “said”), it should be understood to refer to the type or types of transaction data for which there is an antecedent in the claim.”</p> <p>“Therefore, the word ‘data’ must be understood from the context of the claims in which it appears.”</p> <p>“ ... ‘data’ means ‘transaction data’.”</p> | <p>As construed by the Court in its Markman Order</p> |
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| Processing | <p>“the performance of operations upon data and information upon data and information, in contrast to the processing overhead of the operating system and networks.”</p> | As construed by the Court in its Markman Order |
| Sending | “Sending electronically.” | As construed by the Court in its Markman Order |
| “Transmission” and All of its Forms (including “transmit” and “transmitting”). | “Sending of data electronically.” | As construed by the Court in its Markman Order |
| Verifying | “checking or testing the accuracy, exactness or authenticity of.” | As construed by the Court in its Markman Order |
| Communication Network | “a connection of computer and/or devices to facilitate the transmission of data between the computer and/or devices . . .” | As construed by the Court in its Markman Order |

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| Within and between said one or more data access subsystems and said at least one data processing subsystem. | “the communication network facilitates the transmission of transaction data within the one or more data access subsystems, and within the data processing subsystem, and it also facilitates the transmission of transaction data between the various subsystems.” | As construed by the Court in its Markman Order |
| External Communication Network | “a communication network that is external to the remote locations, the central location and the intermediate location.” | As construed by the Court in its Markman Order |
| Encrypt | “the transformation of data into a form unreadable by anyone without a secret decryption key. Its purpose is to ensure privacy by keeping the information hidden from anyone for whom it is not intended.” | As construed by the Court in its Markman Order |

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| scanner | “A hardware device that captures an optical image and converts it into an electronic format where the image is represented as binary data.” | As construed by the Court in its Markman Order |
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| Server | A computer whose role in a network is to provide services and resources to users. | As construed by the Court in its Markman Order |
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| | Polling | As construed by the Court in its Markman Order |
| | “the interrogation of devices one at a time for various purposes, such as avoiding contention, determining operational status, or determining readiness to send or receive data.” | As construed by the Court in its Markman Order |
| | A Domain Name Services Program for Dynamically Assigning One of Said at Least One Server to Receive Portions of the Transaction Data for Balancing the Transaction Data Among Said at Least One Server | As construed by the Court in its Markman Order |

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| | Predefined Template | As construed by the Court in its Markman Order |
| | “a predefined pattern used as a guide or reference.” | As construed by the Court in its Markman Order |

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| | Data Entry Gateway for Correcting Errors in the Panels of Stored Transaction Data. | As construed by the Court in its Markman Order |
| | “a device that is connected to a network and may be used by an operator to correct errors in panels of stored transaction data.” | As construed by the Court in its Markman Order |

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| Network Switch | “a data-link layer device that transfers frames between connected networks or between devices connected to a network..” | As construed by the Court in its Markman Order |
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| Image | An optically or electronically formed representative reproduction of an object, for example, an optical reproduction formed by a lens or mirror or an electrophotical device such as a charge-coupled device (CCD), or other optical system. | <u>Webster’s Third New International Dictionary</u> Attached as Exh. A. |
| Capturing an Image of the Paper Transaction Data | “capturing an image of [documents and receipts (in ‘988)] [check (in ‘137)].” | As construed by the Court in its Markman Order |
| Capturing an Image of Documents and Receipts and Extracting Data Therefrom | “the Court will not read a location into the ‘capturing’ step of claim 46.” “The Court will construe this phrase to mean ‘capturing an image of documents and receipts and extraction data from the image’.” | As construed by the Court in its Markman Order |
| Managing the Capturing and Sending of the Transaction Data | “managing, by way of a computer, a controller, or other device, the operation of the device or devices that capture an image of the paper transaction data and send the captured image.” | As construed by the Court in its Markman Order |

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| A Central Location | <p>“a location that is ‘central’ with respect to the ‘remote locations’. Or, in other words, a ‘remote location’ is ‘remote’ from a ‘central’ location’. A ‘central’ location is distinguished from a ‘remote’ location, as the different modifiers in those phrases plainly suggest.”</p> | As construed by the Court in its Markman Order |
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| Collecting and Sending the Electronic or Paper Transaction Data at Intermediate Locations | Valid | As construed by the Court in its Markman Order |
| Transmitting the Transaction Data Within the Intermediate Location | <p>“The Court has previously defined the terms ‘transmitting’ and the phrase ‘transaction data’. This phrase thus calls for transmitting the transaction data ‘within the intermediate location’. The phrase means that the transaction data is transmitted inside the intermediate location.”</p> | As construed by the Court in its Markman Order |

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| Preamble | <p>“elements recited in claim 42 preamble have been previously defined.”</p> | As construed by the Court in its Markman Order |
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| At Least One First Local Area Network for Transmitting Data Within a Corresponding One of Said One or More Remote Subsystems | “each remote subsystem has associated with it a local area network (LAN) for transmitting transaction data between the components of that remote subsystem.” | As construed by the Court in its Markman Order |
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| A system as in claim 44 wherein said at least one second local area network and said at least one third local area network further comprises and further wherein said data comprises (a) electronic transactions from credit cards, smart cards and debit cards, signature data or biometric data, or (b) paper transactions from documents and receipts. | Valid | As construed by the Court in its Markman Order |
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| Capturing an Image of Documents and Receipts and Extracting Data Therefrom | <p>“Thus, the Court will not read a location into the ‘capturing’ step of claim 46.”</p> <p>“capturing an image of documents and receipts and extracting data from the image.”</p> | As construed by the Court in its Markman Order |
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| Transmitting Data from Each Remote Location to Corresponding Intermediate Location | <p>“The Court has previously defined the terms ‘transmitting’ and ‘data’, and those constructions will apply here. Thus, the Court will construe this phrase to mean ‘transmitting data’, as those terms have been previously construed, from remote location to the intermediate location that corresponds to or services that remote location.”</p> | As construed by the Court in its Markman Order |
| Transmitting Data from Each Intermediate Location to Corresponding Central Locations | <p>“The Court has previously defined the terms ‘transmitting’ and ‘data’, and those constructions will apply here. Therefore, the Court will construe this phrase to mean ‘transmitting data’, as those terms have been previously defined, from intermediate location to the central location that corresponds to or services that intermediate location.”</p> | As construed by the Court in its Markman Order |

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| A method as in claim 48 wherein said transmitting data from each intermediate location to corresponding central locations step further comprises the steps of: packaging the transaction data into frames; and transmitting the frames through the external communication network. | Valid | As construed by the Court in its Markman Order |
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| A method as in claim 46 wherein said data is obtained from (a) electronic transactions from credit cards, smart cards and debit cards, signature data or biometric data, or (b) paper transactions from documents and receipts. | Valid. | As construed by the Court in its Markman Order |
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| Paper Transaction Data Including a Payer Bank's Routing Number, a Payer Bank's Routing Information, a Payer's Account Number, a Payer's Check, a Payer Bank's Draft, a Check Amount, a Payee Bank's Identification Number, a Payee Bank's Routing Information, and a Payee's Account Number | Portions previously construed. "the Court will not construe those various components." | As construed by the Court in its Markman Order |
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| [Paper] Transaction Data Including a Payer Bank's Routing Number, a Payer Bank's Routing Information, a Payer's Account Number, a Payer's Check, a Payer Bank's Draft, a Check Amount, a Payee Bank's Identification Number, a Payee Bank's Routing Information, and a Payee's Account Number | "the Court will not construe those various components." | As construed by the Court in its Markman Order |
| With the Data Access Subsystem Providing Encrypted Subsystem Identification Information and Encrypted Paper Transaction Data to the Data Processing Subsystem | "the data access subsystem encrypts subsystem identification information and encrypts paper transaction data and provides the encrypted information and encrypted data for transmission to the data processing subsystem." | As construed by the Court in its Markman Order |

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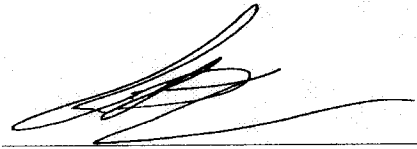
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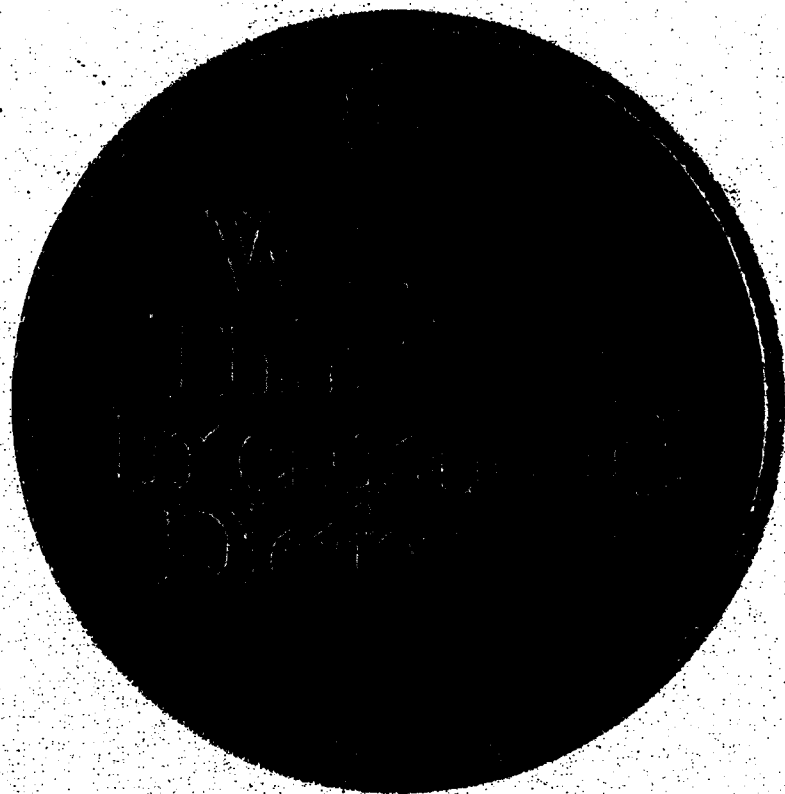
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A handwritten signature in black ink, appearing to read 'Rod Cooper', is written over a horizontal line.

Rod Cooper





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vy-sl-idee \sl'ids,ide\ [NL, fr. *lysta*, genus of burrowing snakes (fr. Gk *lystos* mud + NL -*ide* + -*idae*; akin to OSlav *liti* mud) + -*idae*] *syn* of ANILIDAE

im - see **IN**

im abbr immature

im **abbr** 1 imperial measure 2 inner marker 3 intramuscular

im-age \im'i, -mē\ *n* - [ME, fr. OF, short for *imaginer*; fr. L. *imagin-*, *imago*; akin to L. *imitari* to imitate] 1 a reproduction of a person or thing (as a statue) **1** (1) a reproduction of a person or thing (as a statue) **2** (1) a reproduction of a figure used as a talisman or amulet *esp* in conjurations (as by sorcerers in casting spells) **3** (1) a PICTURE, PORTRAIT **2** (2) a sculptured or fabricated object of symbolic value; IDOL; *specif* : a holy picture (as an ikon) **3** : a thing actually or seemingly reproducing another: as **1** (1) the optical counterpart of an object produced by a lens, mirror, or other optical system and being the geometric figure made up of the foci corresponding to the points of the object — *see* REAL IMAGE, VIRTUAL IMAGE **2** (2) an analogous phenomenon in some field other than optics (as an acoustic ~) (an electric ~) **3** any likeness of an object produced on a photographic negative **3** exact likeness: SEMBLANCE **4** a: a tangible or visible representation: INCARNATION (a civil servant who is the ~ of conscientiousness) *b* archaic: an illusory appearance: APPARITION **5** a (1) a mental picture: IMPRESSION (a soldier haunted by ~s of battle) (~s, as contrasted with sensations, are the responses during a narrative — Bertrand Russell) **2** (2) a mental conception held in common by members of a group and being symbolic of a basic attitude and orientation toward something (as a person, class, racial type, political philosophy, or nationality) (the Frenchness of America) *b* the memory of a perception in psychology that is modified by subsequent experience and that contains both internal and emotional elements elicited by intrapsychic and extrapsychic stimuli; *also* the representation of a stimulus object on a receptor mechanism **6** 1 IDEA, CONCEPT (conflicting ~s of good and evil) **2** a markedly vivid, effective, or graphic representation or description (the set for the play being the ~ of a New England village) **7** a: something concrete or abstract introduced (as in a poem or speech) to represent something else (the *idea* for death) — compare EMBLEM, *series* *b* a figure of speech (as a metaphor or simile)

trope **3** a person who is strikingly like another person in appearance, manner, or thought (a son who is the ~ of his father)

image \im'aj, chiefly in pres part -māj\ *vt* -ED/-ING-*s* **1** : to describe or portray in language *esp* in art effects in vivid manner **2** : to call up a mental picture of: IMAGINE (we no longer ~ the native landscape) **3** to make terms beloved of Rossetti and Tennyson (the *image* of the *lily*) **4** to reflect (the *image* of a face) **5** to appear in a mirror **6** : to make appear (as in desired form) **7** to project (film images on a screen) **8** a: to create a representation of: DEPICT, PORTRAY (a national hero *imagined* in bronze on a village green) **b** (1) : to create or produce a suggestion of: ADUMBRATE (a symphony *imagining* the beauty of nature) **2** : to represent symbolically: stand as a symbol of (acres of headstones *imagining* the losses of the war)

image dissector *n* : a camera tube resembling the iconoscope and having the electron optics focused electromagnetically through an aperture and voltages that are subsequently amplified and transmitted as television-picture signals produced by electron multiplication

im-age-less \im'le\ *adj* : characterized by absence of mental images (an ~ thought)

image orthicon *n* : a camera tube that is similar to the iconoscope or the orthicon and uses secondary emission and electron multiplication to produce the voltages that are subsequently amplified and transmitted as television-picture signals

im-age-ry \im'ij-erē, -mēj-*n* *s* : one that images : a vivid describer or portrayor

im-age-ry \im'ij-erē, -mēj-*n* *es* [ME *imagerie*, fr. MF, fr. *image* + -*erie* -*ry*] *n* : the product of image makers (as a statue, emblem, or idol) : IMAGES; *also* : the art of making images **2** *obs* : IMAGE WORSHIP **3** : ornate or heightened description or figures of speech; *specif* : the often peculiarly individual concrete or figurative diction used by a writer in those portions of his texts where he wishes to produce a particular effect (as a special emotional appeal or a train of intellectual associations) (Shakespeare's ~) **4** : mental images; *esp* : the products of imagination *fr* *sing* of IMAGE

images of *pl* of IMAGE, *fr* *pl* of IMAGE

image amplifier *n* : an attachment for a stellar spectrograph comprised of a system of very small mirrors that direct strips of light from various portions of the star-image disk so that they pass through the narrow slit of the spectrograph thereby increasing the intensity of the star's spectrum several times

image space *n* : a space in connection with an optical system in each of whose points is an image of a corresponding point in the object space

image tube *n* : CAMERA TUBE

image worship *n* : the worship of images as the special residence of a divine spirit or supernatural power: IDOLATRY

imag-in-able \ə'maj(ə)nəbəl\ *adj* [ME, fr. LL *imaginabilis*, fr. L. *imaginari* to imagine + -*abilis* -able — more at *IMAGINE*] : capable of being imagined: CONCEIVABLE (the biggest fish ~) (any ~ situation)

imag-in-able \im'aj-ə-bil\ *adj* [ME, fr. LL *imaginabilis* -*n*ābē\ *n* -ES -*imaj-ə-nə-bil* -*er* -*ies*] *n* -ES -*imaj-ə-nə-bil* -*er* -*ies* *in* sense 4 -māj-ən or -māj-ən -*er* -*ies* or -māj-ən or -maj-ən -*er* -*ies* *adj* [imagine + -*al*] **1** : of or relating to imagination (~ objects) **2** [LL *imaginabilis*, fr. L. *imagin-*, *imago* image + -*alis* -al — more at IMAGE] **3** : of or relating to an image (the idea of weeping can be translated into its ~ equivalent, as rain — K. D. Burke) **4** [NL *imaginabilis* + -*al* -*al*] : relating to mental images **5** [NL *imaginabilis* + -*al* -*al*] : of or relating to the insect image

imaginal disk *n* : a specialized imaginal bud **2** : one of the clusters of undifferentiated cells in the larval and pupae of some insects from which the wings, legs, and other organs of the adult are formed

imaginal type *n* : a tendency of an individual to have images arising predominantly from one or another sense (as from vision, hearing, or taste)

imaginant *n* -s [L. *imaginans*, *imaginans*, pres. part. of *imaginari* to imagine — more at IMAGINE] *obs* : IMAGINER

imag-in-ary \ə'maj(ə)nəri, -lē, -j-*er* -*ies* *adv* : in a imaginary manner

imag-in-ary \im'aj-nerē, -rin-*n* *s* -ES : the quality or state of being imaginary

imag-in-ary \ə'maj(ə)nəri, -rē\ *adj* [ME, fr. L. *imaginarius*, fr. *imaginari* to imagine + -*arius* -ary] **1** a: having no real existence: existing only in imagination or fancy: UNREAL, FANCIED, FICTITIOUS, HYPOTHETICAL (to guard the *imaginary* against their real and their ~ foes, the wolves and the witches — L. C. Frazier) *b* : falsely characterized or ascribed outside their actual or arbitrary (the statue of John Harvard ... is an likeness; no portrait of Harvard is known to exist — *Amer. Guide Series*; Mass.) **2** *obs* : of the nature of or suggesting a image **3** *obs* : IMAGINATIVE **4** : containing or related to the imaginary unit

SYN FANCIFUL, VISIONARY, FANTASTIC, CHIMERICAL, QUOTKOT IMAGINARY stresses lack of reality; it indicates an existing formation, process, or imagination; IMAGINATION, not fact (those *imaginary* persons who may be terrified by *imaginary* dangers) *after* courageous in the face of real danger — Havelock

heighten the notion of *extravagant fancy* far transcending the usual, ordinary, or real (one of the human errors to which we are subject before that of the commonplace of daylight orders and moderate *fantasy*) *tenebrous* and *fantastical* imaginations —Rosa Luxemburg (a *fantastic* world inhabited by monsters of iron and steel —Louis Bromfield) (two heroes may mangle each other in every impossible and *fantastic* way, beyond the bounds of the faintest shadow of verisimilitude —H.O. Taylor) CHIMERICAL suggests the wild, utterly unreal, and extravagantly imaginary characteristics of creations of mythical mythology (the defeat was more complete, the victory more humiliating ... the hopes of revival must be abandoned —*Times Lit. Supp.*) (as *chimerical* as the *fantasy* —Bernard Smith) QUIXOTIC describes completely unrealistic and impractical devotion to romantic or chivalric ideals (was *quixotic*, and would not permit a secret service and spies —G.K. Chesterton) (among the last *quixotic* acts of his life was an attempt to set up a Greek academy for aspiring authors —Alfred Kreybork) (be so *quixotic* as to stand upon principles at the risk of losing the business —R.M. Cunningham)

imaginary ˈɪ-mə-ˈzɪ-ə-ˈnɛ-ɪ 1 *obs* : a figment of imagination 2 : a complex number (as $2+3i$) *whenever* imaginary part is not zero

imaginary part *n* : the part of a complex number (as " $3i$ ") in $2+3i$) that has the imaginary unit as a factor

imaginary unit *n* : the positive square root of minus 1 : $\sqrt{-1}$ symbol *i*

imag-i-na-tion ˌɪ-mə-ˈnæ-ʃən *n* -s [ME *Imaginacoun*, fr. MF *imagination*, fr. L *imaginatio*-, *imaginatio*, fr. *imaginatus* (past part. of *imaginari* to imagine) + *-ion*-, *-io* -*ion* —more at *IMAGINE*] 1 : an act or process of forming a conscious idea or mental image of something never before formed or perceived in reality by the imaginator (as the synthesis of remembered elements) 2 : a sensory experience or ideas as modified by unconscious mechanisms of defense) ; also : the ability or gift of forming such conscious ideas or mental images esp. for the purposes of artistic or intellectual creation (our simple apprehension of corporeal objects, if present, is sense; if absent, is —Joseph Glanvill) 2 a : creative activity or power (the *imaginative* powers of the artist) b : the creative content or GENIUS (the great ~ of literature) 3 : the attempt to deal with a problem : a solution (the situation demands) *whatsoever* suggests *imaginative* plotting or scheming esp. of evil : *whatsoever* all their ~s against me —Lam 3:60 (AV))

4 a : a mental image, conception, or notion formed by the action of imagination b : a creation of the mind; esp : an idealized or poetic creation (the glory ~s of folk poetry) c : fanciful or empty assumption (idle ~s) 5 : popular traditional belief : usual or accepted conception (the Magna Charta ... has operated in this meaning given it in ~ rather than by its literal contents —John Dewey)

IMAGINATION FANCY, FANTASY, PHANTASY : IMAGINATION, free of derogatory connotations than the other terms, is the most comprehensive, applying to the power of creating, in the mind or in an outward form as in a literary work, images of things once known but absent, of things never seen or never seen as they are, of things actually nonexistent or of things perfected or new from diverse old elements, and of things created or idealized; it may carry the implication of mere tricky concoction, as in "things unreal or odd, but is more frequently neutral, the other extreme in suggesting the genuine artist's gift of perceiving more deeply or essentially and creating thought interestingly and the significantly new and vital (all youth lives much in reverie; thereby the stronger minds anticipate and rehearse themselves for life in a thousand *imaginative* ways —H.G. Wells) (*imagination* being little else than a power for illusion —Samuel Butler) (the *imagination* is able to manipulate nature as by pulling three legs and five arms but it is not able to create a totally new nature —Wallace Stevens) (the production of vivid images, usually visual images) (the commonest and the least interesting thing which is referred to by *imagination* —I.A. Richards) (a product of fancy rather than by imagination —if one accepts fancy as decorative and *imagination* as creative —Pamela L. Travers) (*imagination*, in his opinion, gets at relationships that are true at the deepest level of experience —F.A. Pottle) (*imagination* is the deepest akin to what it was in Wordsworth, a measure of the deepest insight and sympathy —Roy Pascal) (the world might be —Bertrand Russell) (as *imagination* suggests the power to conceive and to express to images of things removed from reality, usually of things purely, sometimes frivolously though often delightfully, imaginary, often contrasting with IMAGINATION in suggesting a more superficial often factitious power of invention, as the novel or unreal by recombining existing things, as opposed to the imagination's power of creating a deeper, more organic reality like that of the men of a vivid fancy, he was called a man of the *imagination* —G.D. Brown) (the associative faculty performs, to a varying extent in individual cases, constantly shifting arrangements and rearrangements of the data of observation, thought, feeling ... which Coleridge distinguishes from imagination, or fancy —George Whalley) (in a creative sense the *imagination* is the power to make-believe —K.P. Kempton) (the *imagination* makes the power of unrestrained fancy) (the *imagination* is used more frequently than FANTASY in the technical sense of image-making power in general (hard to say where the actuality ends and the *fantasy* begins in the sketches of life —B.C.L. Keelan) (fairy stories are the *imagination* of a child —Lrinia) (an appealing phenomenon popular —Time) (*fantasy*, though it is in what is realistic and homely —Time) (*fantasy* may be distinguished from the representation something that actually exists, but it is not opposed "reality" and not an "escape" from reality. Thus, the idea of a rational society, or the image of a good house to be built, or the story of something that never happened, are *fantasy* —Lionel Trilling) (this mechanical manner of *fantasy* —C. Futureure ... of comic *fantasy*, improbable adventure and rainbow colors —G.E. Fox) (a novelist is a person who has a highly developed gift of *fantasy* —Bernard I. Voto) (its invention is based on the extinction of a *fantasy* belonging to the period of puberty —D.F. Tait)

imag-i-na-tion-al ˌɪ-mə-ˈnæ-ʃən-əl *adj* : of, relating to, involving, caused by, or suggestive of the imagination

imag-i-na-tive ˌɪ-mə-ˈnæ-ʃən-əl *adj* : of, relating to, involving, caused by, or suggestive of the imagination

[ME, fr. MF *imaginativus*, fr. L *imaginatio* + *-ivus* -ive] 1 : of relating to the imagination; as : created, inspired, guided or drawn from the imagination and not from known facts sources (an ~ biography) b : tending to provoke, excite, enliven the imagination (a few ~ comments) c (1) : able to handle new or difficult problems : RESOURCEFUL (a young ~ general) (2) : imbued with or showing an ability to draw conclusions, suggest hypotheses, make comparisons, or form systems (an ~ interpretation of power) (3) : full of or characterized by originality, or vividness (a ~ pattern) d : wholly ~ 2 : of or relating to images; esp : showing distinctive or fine command of artistic images (a ~ diction)

imag-i-na-tive-ly ˌɪ-mə-ˈnæ-ʃən-əl *adv* : in an imaginative manner (a play produced ~) (an ~ planned garden)

[illegible]